

Global GreenTag^{Cert™}

RECYCLED CONTENT & CIRCULARITY
DECLARATION (RC²D) STANDARD

V1.0 DRAFT FOR PUBLIC CONSULTATION



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Global GreenTag International Recycled Content and Circularity (RC²D) Standard

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QUALITY STATEMENT

This Program is assessed under the Global GreenTag International Quality Management System (QMS) which is certified to ISO 9001:2015 (International Organization for Standardization, 2015). GreenTag management and employees are committed to providing independent third party, accurate product conformance assessments against this standard for all compliant products and providing excellent customer and stakeholder communication and services, as well as committing to the pursuit of continual improvement, environmental and social sustainability within our own organisation.

DOCUMENT ABSTRACT

This Standard specifies environmental and other performance requirements of products under the Global GreenTag Ecolabel Program (GreenTag^{Cert}TM). This Program complies with ISO 14024: "Environmental labels and declarations - Guiding principles" which requires environmental labelling specifications to include criteria that are objective, reasonable and verifiable. All Assessments also comply with AS NZS ISO 14021:2000, "Environmental labels and declarations — Type II Self-declared environmental claims". All assessments are independently verified to have been undertaken in compliance with ISO 17065:2012 and ISO 17020: 2026.

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Terms & Definitions Related to Recycling

Actual recovery: The share of the recoverable outflow that is recovered given the end-use market's recovery infrastructure.

Applicant: The party that is responsible for ensuring that Products meet and, if applicable, continue to meet, the requirements on which the certification is based. An Applicant can be a distributor or manufacturer or assembler.

Book and Claim: Recycled material credits are purchased. The product output uses recycled material credits to suggest recycled content, but this recycled material claimed is not included in the product output.

Chain of Custody (CoC): A verified system for tracking recycled material through each stage of the supply chain, documenting ownership and handling. Additionally, it defines the rules for managing recycled materials, to ensure their characteristics remain transparent through the supply chain and can be accounted for in the final recycled content goods (ISO 22095:2020) (International Organization for Standardization, 2020). This is important for intangible characteristics, such as the recycled content percentage

and origin, which may be claimed, but are difficult to determine or validate through testing or other methods. Chain of custody provides the evidence to support accurate recycled content claims.

Circular inflow: The share of a material's total inflow mass that is non-virgin (recycled, reused or refurbished) or renewable (bio-based from a verifiably sustainable source).

Circular outflow: The share of a material's total outflow mass that is recovered at end of life, expressed as the product of recovery potential and actual recovery rate.

Controlled Blending: The recycled content comes from multiple sources. Recycled content from different sources is mixed. The recycled content of the product output is mixed with virgin material at a known proportion. This proportion is consistent over time.

Defined Materials: Materials made up entirely of known Chemical Substances, e.g. A chemical formulation is a type of homogeneous material prepared according to a defined formula, typically referring to a material in liquid form. A compounded material is a type of homogenous material prepared according to a defined formula, typically referring to a material in solid form. A metal alloy is a combination of two or more metallic substances, especially to give greater strength or resistance to corrosion. Examples for which special conditions on content inventory apply: Metal alloy material; Float glass; Ceramics; Mixed Hardware; Electronics; Reaction Products; Defined substance without identifier.

Design for Disassembly: Applies to product streams containing distinct components (e.g. furniture, partitions, storage, etc.) and implies products are designed so that components are easily disassembled. The processes which are required in product removal from site and component separation must not involve specialist tools so that a future recycler, Applicant/supplier or another third party, can easily direct the different materials into the appropriate reuse or recycling streams.

Direct Responsibility Fiduciary and legal responsibility for quality, consistency, legal compliance, safety and other issues including reputational risk.

Distribution: The stage in the supply chain where finished goods are transported or delivered from the manufacturer to retailers, wholesalers, or other customers.

Distributor A party that buys intermediate or finished products; warehouses and resells them to retailers, end users or other actors in the supply chain but does not add value to the product.

ESCAP Ecospecifier Cautionary Assessment Process

Exposure The actual contact that a person has with a chemical. It can be one-time, short-term, or long-term.

Heavy Metal Generally considered including those metals with a specific gravity that is at least 5 times the specific gravity of water. Metals of concern include antimony, arsenic, bismuth, cadmium, cerium, chromium, cobalt, gallium, gold, iron, lead, manganese, mercury, nickel, platinum, silver, tellurium, thallium, tin, uranium, and vanadium

Homogenous Materials A uniform solid, liquid or gas composed of one or more substances that cannot be mechanically disjointed, in principle. It may be a chemical formulation or compound; of undefined composition (UVCB); or a combination of the two. Coatings and finishes such as plating, powder coats, enamels, etc. are considered unique homogenous materials.

Identity Preservation: The recycled content comes from a single source. Recycled content from different sources is not mixed. The recycled content of the product output is 100%.

Manufacturing: The process of using reprocessed or virgin materials to produce a finished product or an intermediate product for incorporation into a final good.

Mass Balance: A chain-of-custody approach, as defined in **ISO 22095** (International Organization for Standardization, 2020), that allows recycled and non-recycled materials to be mixed within a production system, with the recycled content allocated to specific outputs based on the proportion of recycled input. The method ensures that the total quantity of recycled material

claimed in outputs does not exceed the verified amount introduced as input, providing a traceable and auditable accounting system without requiring physical segregation.

Material Recovery: The process of collecting and extracting materials from waste streams that would otherwise go to landfill or incineration, to prepare them for recycling or reuse.

NOAECs No Observed Adverse Effects Concentration. The highest level of a chemical stressor in a toxicity test that did not cause harmful effect in a plant or animal. While NOAELs and NOAECs are similar, they are not interchangeable. A NOAEC refers to direct exposure to a chemical (e.g. through gills or the skin).

NOAELs No Observed Adverse Effect Levels for any ill-effects that might occur. Also called NOEL is the highest dose in an investigation that does not cause ill effects. A NOAEL refers to a dose of chemical that is ingested.

Post-consumer material: Material generated by households or by commercial, industrial and institutional facilities in their role as end-users of the product which can no longer be used for its intended purpose. This includes returns of material from the distribution chain.

Pre-consumer material: Material diverted from the waste stream during a manufacturing process. It **excludes** reutilization of materials such as rework, regrind or scrap generated in a process and capable of being reclaimed within the same process that generated it.

Product A 'Product' is any material/s, product/s comprising of parts, homogenous materials, substances, etc. or technology undergoing GreenTag certification. Described herein as Product.

Product Assessor A 'Product Assessor' (also 'Assessor') is a member of the GreenTag certification team responsible for independent assessment of products to determine their conformance or non-conformance to each applicable criterion of this GreenTag International Standard. They are required to be certified by RABQSA, IRCA or other national or international auditor accreditation system.

Product Stewardship: A product-centered approach to environmental protection implying that operating entities in the product's life cycle (e.g., suppliers, retailers, users) need to share responsibility for reducing its environmental impact. Practically, product stewardship is understood as the Applicant's service to the customer to collect the Product for reuse, recycling or reprocessing whenever the customer no longer requires its service.

Program Director A 'Program Director' amongst other responsibilities is also liable for decisions relating to its granting, maintaining, extending, suspending and withdrawing of certification; has a role in National Advisory Committee (NAC) and Expert Panel; manages disputes and complaints regarding compliance with the standard.

Recovery potential: The technical share of an outflow that can be recovered through reuse, recycling, composting or anaerobic digestion.

Recycled content: the proportion, by mass, of recycled material in a product or packaging. Only pre-consumer and post-consumer materials shall be considered as recycled content, see pre-consumer and post-consumer materials definition.

Recycled Material: Material that has been reprocessed from Reclaimed Material by means of a manufacturing process and made into a final product or into a component for incorporation into a product.

Reprocessing: The transformation of recovered materials into a form suitable for manufacturing, usually involving mechanical or chemical processes.

Risk: Risk is summarised as 'Hazard x exposure', a measure of the likelihood or probability of such damage occurring under circumstances of exposure

Routes of Exposure Ingestion, inhalation, dermal or conjunctival.

Sale for Final Use: The transfer of ownership of the product to an end user or consumer, marking the end of the product's supply chain.

Segregation: The recycled content comes from multiple sources. Recycled content from different sources is mixed. The recycled content of the product output is 100%.

Substance A substance of fixed composition, characterized by its molecular structure(s), which typically has an associated CAS RN (and may also have synonym CAS RNs).

Supplier Any party that is responsible for producing or manufacturing or assembling of intermediate homogenous materials or substances to be used as inputs for the Product. Where a supplier is only a distributor or wholesaler and adds no value to the Product, they will be classified as Distributors.

Tier 1 supplier Tier 1 supplier is one who is 'Directly Responsible' (see definition) to the Manufacturer or Assembler.

Toxicity The ability of a chemical to produce adverse effects in living organisms, i.e. damage an organ system, disrupt a biochemical process, or disturb an enzyme system.

Traceability. The ability to systematically track recycled content through the supply chain, from source to final product.

Undefinable Materials (UVCBs): A mixture of Unknown or Variable composition, Complex reaction products or biological materials, typically with an unrefined nature and/or uncontrolled source, e.g. mixed aggregate, recycled content, geological material etc.

NOTES FOR REFERENCED STANDARDS

Any references to existing standard include current versions and their subsequent versions in particularly those called up by reference Green Building and product rating tools, as appropriate.

This standard is derived from the Global GreenTag International Standard, the Global GreenTag Cleaning Product Standard and the Global GreenTag Personal Product Standard.

PROGRAM RULES

The Global GreenTag Certification Program (GreenTag^{Cert™}) is operated under the Global GreenTag International Pty Ltd (GGTI) program rules (GGTI GPR-4.1a). All assessments, certifications, and compliance activities under this standard are conducted in accordance with these program rules.

1 Scope and Purpose

Global GreenTag International certification body is recognised globally for its commitment to sustainability and product transparency, has developed this manufacturer-level standard for the verification of recycled content in products. This standard responds to the growing demand for accurate, evidence-based environmental claims in line with national and international expectations, including the Australian Competition and Consumer Commission (ACCC) Green Marketing Guidelines, ISO 14021 (International Organization for Standardization, 2016), ISO 22095 (International Organization for Standardization, 2020), ISO 14024 (International Organization for Standardization, 2018), the framework of the circular economy (ISO 59020) (International Organization for Standardization, 2024) and the Australian national framework for recycled content traceability guidelines (DCEEW, 2023).

By establishing a consistent methodology for verifying and reporting recycled content in manufactured goods, this standard aims to support credible environmental declarations, reduce greenwashing, and align manufacturers with Australia's broader sustainability goals.

Purpose

The purpose of this standard is to:

- Define a transparent, auditable process for verifying recycled content in products and materials at the manufacturer level,
- Provide guidance for calculating and substantiating claims about post-consumer and pre-consumer recycled content,
- Support compliance with the best international practices and national consumer protection standards,
- Enable product manufacturers to demonstrate circular economic performance and contribute to responsible material use in supply chains.

Scope

This standard applies to all manufactured products and components where recycled content claims are made. It is relevant to:

- Finished goods, intermediate parts, and packaging,
- A broad range of materials including plastics, metals, paper, textiles, glass, and composites etc.,
- Both self-declared (Type II) and third-party verified claims.

Modular Scope

This Standard adopts a modular framework designed to ensure both broad applicability across diverse material categories and structured flexibility in the assessment of sustainability performance. The modular approach enables the Standard to maintain a consistent core methodology while accommodating supplementary assessment areas relevant to specific environmental, social, and technical considerations.

The core module applies universally to all certified products and establishes the minimum requirements for certification. This includes verification of recycled content, supply chain traceability, and chain of custody integrity. The core module ensures comparability and consistency across all product categories assessed under this Standard.

In addition to the core requirements, the Standard incorporates optional supplementary modules that may be applied based on product type, industry sector, regulatory context, or client-specific requirements. These modules include, but are not limited to, social and labour practice assessment, chemical safety and hazard evaluation, circularity and resource efficiency indicators, and product stewardship performance.

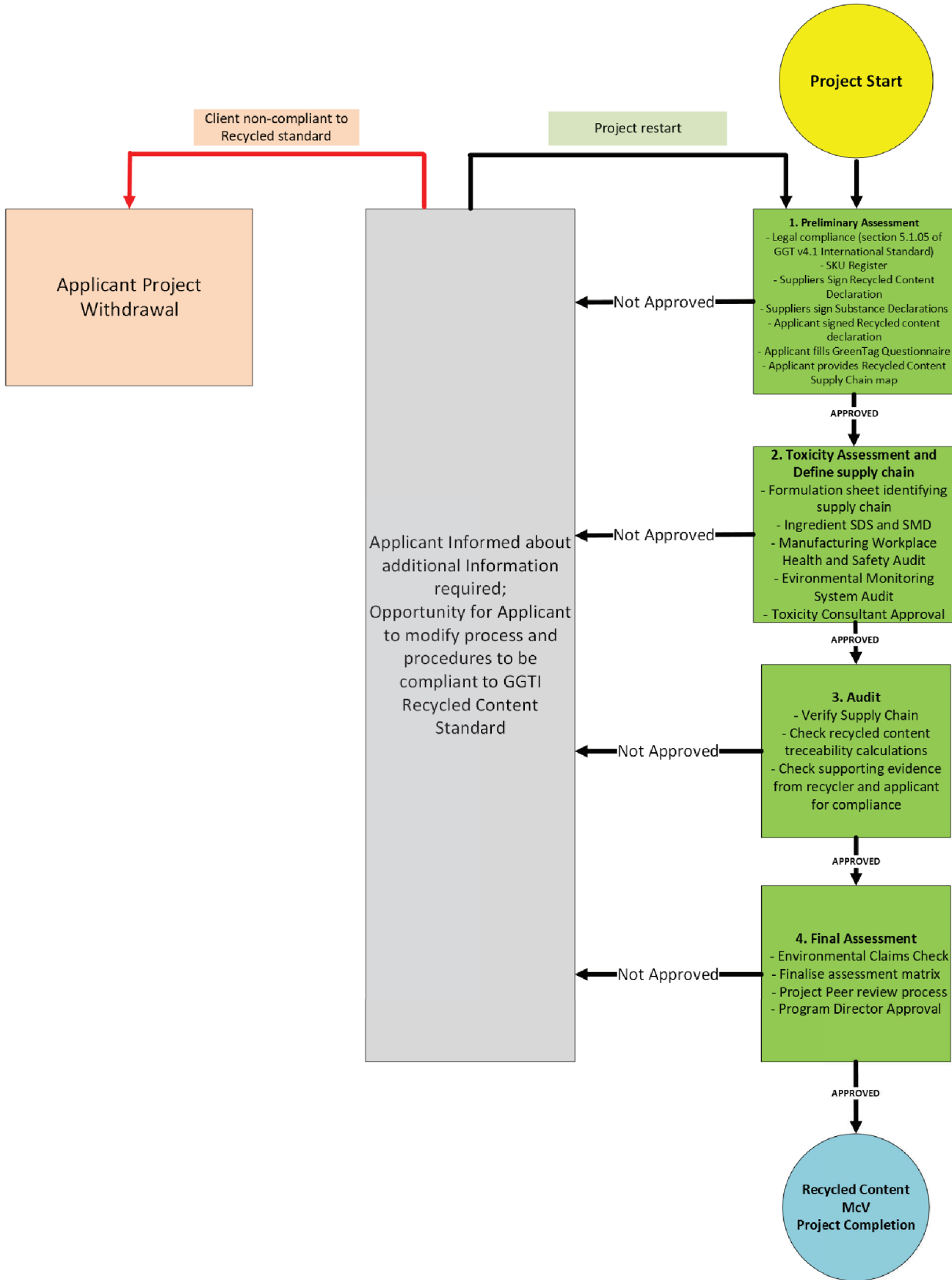
This modular structure is designed to enhance alignment with internationally recognised certification frameworks that similarly adopt layered or extensible assessment models. It enables harmonised application across jurisdictions while avoiding unnecessary compliance burden for products where certain modules may not be relevant.

This modular framework has been developed in alignment with ISO principles governing environmental claims (ISO 14021), ecolabelling systems (ISO 14024), and chain of custody traceability (ISO 22095), ensuring that assessment outcomes are verifiable, transparent, and consistent with internationally recognised best practice.

The standard specifies:

- Definitions and categories of recycled content,
- Acceptable chain of custody models (e.g., segregation, mass balance),
- Quantification methods,
- Evidence requirements, and
- Labelling protocols.

It is designed for use by manufacturers, auditors, certifiers, and procurement professionals seeking to validate recycled content claims in the Australian market and internationally.



2 Normative References

The following documents, in whole or in part, are referenced in this guidance and are indispensable for its application. For dated references, only the edition cited applies; for undated references, the latest edition applies.

- Global GreenTag International Standard — current published version.
- Global GreenTag Personal Product Standard — current published version.
- Global GreenTag Cleaning Product Standard — current published version.
- United Nations Globally Harmonised System of Classification and Labelling of Chemicals (GHS).
- EU Directive 2011/65/EU (RoHS) and amending Directive (EU) 2015/863 (RoHS 3).
- Regulation (EC) No 1907/2006 (REACH), including Annex XVII — Restrictions on the manufacture, placing on the market and use of certain dangerous substances.
- WBCSD, *Circular Transition Indicators* — Metrics for business, by business – Current published version

3 Global GreenTag Recycled Content and Circularity (RC²D) Standard Assessment

RC2D Standard is a science-based certification framework that recognises and rewards the use of recycled material in manufactured products across construction, interior fitout and consumer product categories. The Standard is designed to provide manufacturers, specifiers, procurement professionals and green building rating bodies with a credible, independently verified basis for product selection decisions that support circular economy outcomes.

Certification is awarded at four progressive tiers - Bronze, Silver, Gold and Platinum. These are determined by a product's Weighted Recycled Content Score (WRCS). The WRCS applies a scientifically justified 2:1 weighting in favour of post-consumer (PC) recycled content over post-industrial/pre-consumer (PI) recycled content, reflecting the greater avoided-burden value of material recovered from end-of-life waste streams: $WRCS (\%) = PC + (0.5 \times PI)$. Bronze is accessible to products at the start of a recycled content journey with no minimum post-consumer content requirement. Silver, Gold and Platinum require progressively higher post-consumer content proportions a minimum of 10%, 25% and 80% respectively from documented chain of custody through to independent audit.

All applicant products must satisfy five mandatory threshold requirements before any tier can be awarded. First, products must undergo a toxicity assessment under the Global GreenTag ESCAP/GCAP framework, demonstrating that the product and its recycled feedstocks do not contain substances of very high concern at concentrations above applicable thresholds and relevant biodegradability and ecotoxicity guidelines stipulated under the ESCAP process. Second, applicant organisations must demonstrate social and legal compliance, including a documented modern slavery policy that demonstrates that the organisation is taking clear steps to address modern slavery and, if found, has an action plan with targets for removing and preventing it reoccurring in the supply chain. Third, organisations must operate a documented Environmental Management System (EMS) aligned with ISO 14001:2015 or equivalent covering the environmental aspects of recycled feedstock sourcing and product manufacturing with a commitment to continuous improvement. Fourth, a systematic Occupational Health and Safety (OHS) management system certified to ISO 45001:2018 or an equivalent recognised standard, verified by an accredited third party certification body must be in place, with specific attention to the hazards associated with post-consumer material streams. Fifth, applicant products must demonstrate durability and fitness for purpose through compliance with applicable AS, AS/NZS or ISO performance standards or accredited third-party testing, confirming that recycled content has not compromised the product's functional performance or service life.

3.1 Toxicity Assessment and Supply Chain Definition

All toxicity and health impacts are assessed in accordance with the most current version of ESCAP or GCAPs as relevant. ESCAP and GCAPs are toxicity risk assessment processes that use the United Nations Globally Harmonized System of Classification and Labelling of Chemicals (GHS). Evidence is required to classify substances according to GHS.

Applicants are required to provide a full declaration (representing 100%) of substances down to 0.01% by weight for each homogenous material used in the final product (or further such more detailed requirements as may be required by sector specific or Global GreenTag Supplementary Standards) and provide evidence for each homogenous material which declares their hazards and complies with the relevant Global GreenTag Standard declaration requirements (International, 2024) including the Global GreenTag Cleaning Product Standard and the Global GreenTag Personal Product Standard.

This generally requires 100% disclosure material inputs with an identifying CAS, however under certain instances other evidence is acceptable. For example, declaration documents drafted under legislation like 'Regulation (EC) No 1272/2008 on classification, labelling and packaging substances and mixtures' can be used in specific instances without 100% material declaration if they are fully updated with most recent hazard classifications in the European Union and used at 1% or less of the final product as of July 2025, and those hazard classifications declared by formal Statutory Declaration of a senior responsible executive of the company

Products are assessed for:

- a) Presence of restricted or hazardous substances (as per ESCAP or GCAPs);
- b) Full material disclosures including Safety Data Sheets (SDS);
- c) Defined supply chain stakeholders, including recyclers, processors, and manufacturers;
- d) Recognised Chain of Custody Certifications (e.g. FSC and Responsible Wood)

The ESCAP (Ecospecifier Cautionary Assessment Process) and GCAPs (Global GreenTag Cautionary Assessment Processes) are applied to:

- a) Assess hazardous substances (e.g., SVHCs, heavy metals, endocrine disruptors).
- b) Evaluate risk categories (Level 0–3, per ESCAP methodology).
- c) Require substance disclosures down to 0.01% by weight.
- d) Map out all supply chain actors from material recovery to manufacturing.

3.1.1 Risk Assessment Certification Restrictions

Carcinogens: restricts user exposure to substances to less than the NOAEL/NOAEC or zero if NOAEL is unknown.

Toxic Substances: limits exposure to acutely toxic substances, toxic substances (or requires Applicant/Supplier to meet a well-documented and justifiable industry specific benchmark for material toxicity), heavy metals – (as a minimum arsenic, cadmium, chromium, copper, lead, tin, mercury and antimony).

Hazardous Chemicals: restricts or bans the use of the following hazardous chemicals as they apply to the standard's relevant product group:

- Persistent Organic Pollutants (POPs) and Substances of Very High Concern (SVHCs)
- Endocrine Disrupters
- Mutagens and Teratogens
- Bio-accumulative chemicals
- Irritants and sensitizing agents

via the analysis of a fully detailed list of constituents at an appropriate level of detail relevant to the level of toxicity of the constituent compounds.

Note: ESCAP excludes any product to be certified from containing any materials contained within Annex III of the Rotterdam Convention and Stockholm Convention ,prohibits or restricts relevant agents in the OSHA List of Highly Hazardous Chemicals, Toxics and Reactive and EU SVHCs (including on both the Authorized and Candidate Lists).

3.1.2 Supply Chain Risk Assessment on Safe Handling, Use and End-of-Life

ESCAP and GCAPs evaluate risk across the supply chain. Toxicity risks which do not result in certification exclusion but have hazards which contribute to a human and environmental health risk are required to provide evidence that demonstrates an **acceptable risk** reduction which under this standard is defined as "Issue of concern" and that Red-Light Comment or Red-Light Exclusion for material substances in the final assessment is an **unacceptable risk** and cannot be certified. An example of evidence to demonstrate risk reduction in the manufacturing stage of the supply chain could be an ISO 14001 EMS (International Organization for Standardization, 2026)with OHS documentation that shows proper storage of hazardous solid/liquid chemicals, training equipment and safety equipment distribution to workers..

3.2 Legal and Regulatory Compliance

3.2.1 General Requirements

Manufacturers and their suppliers within their supply chain map shall demonstrate compliance with all applicable national, state, and local legislation governing social and environmental legal requirements, occupational health and safety in the jurisdiction(s) in which they operate. The requirements for legal compliance shall include modern slavery requirements as specified in the Global GreenTag International Standard PAC-5 and SAC-6.

3.2.2 Work Health and Safety (WHS) and Occupational Safety

- Applicants and manufacturers/relevant suppliers shall maintain a publicly available health and safety management system certified to ISO 45001:2018 – Occupational Health and Safety Management Systems, or an equivalent recognised standard, verified by an accredited third-party certification body across all manufacturing facilities and operations involved in the production of materials supplied for certification.
- Adequate measures shall be in place to ensure the safety of employees, contractors, and visitors, including documented safety management systems, training, and risk assessments.
- Evidence of compliance may include workplace safety certifications, training records, inspection reports, and incident registers.

3.2.3 Environmental and Waste Management Regulations

- Recyclers and manufacturers must comply with environmental permits, licences, and approvals related to recycling, processing, and handling of materials.
- Compliance should cover waste classification, handling, storage, and disposal practices as regulated by state/territory environmental protection authorities (e.g., EPA in Australia).
- Supporting evidence may include environmental licences, audit reports, and compliance statements.
- Applicants and manufacturers/relevant suppliers are required to provide evidence or a statement from a credible third party confirming an ISO 14001 compliant Environmental Management System or equivalent demonstrating the gathering of data on material usage and waste generation in a format that allows optimization of the production process, along with a commitment to continual improvement in the production process

3.2.4 Product Stewardship and Recycling-Specific Laws

- Applicants must provide information on how customers/users install, use, maintain, repair, return or dispose of the product
- Where applicable, organizations must comply with relevant legislatively mandated product stewardship schemes, packaging targets, and recycling obligations.
- Participation in national initiatives should be documented and verifiable.

3.2.5 Verification of Legal Compliance

The certification body will require the manufacturer and their recycler(s) including the material recoverer to provide documentary evidence of regulatory compliance, including:

- Copies of current licences and permits;
- Evidence of regulatory reporting submissions;
- Safety management documentation;
- Confirmation of no major outstanding regulatory non-conformances.

3.3 Social and Legal Compliance

3.3.1 General Requirements

Manufacturers and their recycling partners shall demonstrate compliance with internationally recognised labour standards, including the International Labour Organization (ILO) Conventions, national employment legislation, and applicable modern slavery laws. All employment practices must uphold the principles of human dignity, freedom, and fair treatment.

3.3.2 Prohibition of Child Labour (ILO Convention 138 & 182)

- Organizations shall not engage in or support the use of child labour, as defined by ILO Convention 138 (Minimum Age) and ILO Convention 182 (Worst Forms of Child Labour).
- Employees under the legal minimum age for employment in their jurisdiction are strictly prohibited from participation in any stage of recycled material processing, material recovery, reprocessing, manufacturing, distribution and retail sale. (International Labour Organization, 1973) (International Labour Organization, 1999)

3.3.3 Prohibition of Forced or Compulsory Labour (ILO Convention 29 & 105)

- No form of forced, bonded, or compulsory labour shall be used in any part of the supply chain, in line with ILO Convention 29 (Forced Labour) and ILO Convention 105 (Abolition of Forced Labour).
- Workers must have the freedom to leave their employment upon reasonable notice, without retention of personal documents or wages. (International Labour Organization, 1930) (International Labour Organization, 1957)

3.3.4 Fair and Safe Employment Practices

- All workers shall be employed under legal, documented contracts, with wages and working hours compliant with national labour laws and industry standards.
- Equal opportunity and non-discrimination principles must be upheld, ensuring fair treatment regardless of gender, ethnicity, religion, or status.
- Safe and healthy working conditions must be provided in line with local Work Health and Safety (WHS) requirements.

3.3.5 Verification of Ethical Employment

The certification body shall require manufacturers and recyclers to provide evidence of compliance, which may include:

- Signed declarations of adherence to ILO conventions and national labour laws;
- Worker employment contracts and wage records;
- Third-party audit reports or social compliance certifications (e.g., SA8000, SEDEX, or equivalent);
- Evidence of corrective action plans in the case of identified non-conformance.

3.4 Durability and Fitness for Purpose

3.4.1 General Requirements

Manufacturers seeking recycled content certification shall ensure that all finished products remain compliant with relevant national and international fitness-for-purpose standards applicable to their product category for finished products. Verification of durability and product performance is essential to ensure that the incorporation of recycled content does not compromise product safety, reliability, or intended use. This includes recycled content supplied as raw material inputs (e.g. plastic moulding pellets) as well as recycled content incorporated into finished products.

3.4.2 Product Category–Specific Standards

- Each product shall conform to the applicable Australian Standards (AS/NZS) or equivalent internationally recognized standards that govern its durability, safety, and performance.
- Where category-specific standards exist, the manufacturer must provide documented evidence of compliance.

3.4.3 Evidence of Conformance

Manufacturers shall provide the following as supporting evidence:

- Declarations of Conformance referencing the relevant product or material category standards.
- Product Warranty Statements confirming durability expectations and fitness for intended use.
- Independent Test Reports from NATA-accredited laboratories (or other ISO/IEC 17025 accredited facilities internationally) confirming compliance with applicable standards for raw material inputs or finished products.

3.5 GGTI Verification

GGTI shall review all submitted evidence to confirm that raw materials or finished products containing recycled content meet durability and performance requirements. In cases where independent test data is not available, the certification body may request additional third-party testing prior to granting certification.

4 Recycled Content Verification Process Overview

The recycled content verification process provides a structured methodology to ensure all claims are accurate, traceable, and supported by objective evidence. It begins with a preliminary assessment of the applicant’s documentation and management systems, followed by an audit conducted by the certification body to review operational controls and supporting records.

The process includes tracing recycled content provenance back to the first material recovery location and confirming the administrative division of origin, as well as tracing recycled content composition through invoices, weighbridge data, and widely acceptable chain of custody methodologies to validate declared percentages. Verification also considers other chain-of-custody approaches mentioned in section 4.3.2 to ensure the chosen model is consistently implemented and adequately documented across the supply chain.

4.1 Preliminary Assessment

An Applicant seeking a Recycled Content and Circularity Certification must provide evidence of the following as a minimum:

1. A stock keeping unit (SKU, GITN, QR Code or equivalent approved unique product identification) register that identifies all products scoped for recycled content verification.
2. A full (100%) declaration of substances down to 0.01% weight for each homogenous material used in the final product (or furthermore detailed requirements as when required under sector specific or Supplementary standards) that declares recycled and non-recycled content material using a product formulation questionnaire.
3. A supply chain register, i.e. an official list of supplier information. This information is used to construct the supply chain map. The submitted register is used to establish the supply chain we need to audit verify. It should include the following data:
 - Specific location/s of the recycled material reprocessing sites for recycled material suppliers. Recycled material processing sites should also have their processing methods and percentage of post-consumer or pre-consumer material documented.
 - Chain-of-custody (CoC) for manufacturer and recycled material reprocessing sites (e.g. identify preservation, segregation, controlled blending, mass balance, book and claim);
 - FSC, Responsible Wood or PEFC CoC Certification for any recycled wood fibre content
4. To reduce the risk uncertainty in the risk assessment and receive a Verified Recycled Content claim, the supply chain register should also include:
 - Specific location/s of the material recovery sites and the administrative division level (i.e. province, district or municipality) from where materials originate.
 - Chain-of-custody for each of the material recovery sites.
 - Feedstock source stream (e.g. commercial or domestic), feedstock type and whether the feedstock is post-consumer or pre-consumer according to ISO 14021:2016 (International Organization for Standardization, 2016).
5. Completed Declarations from Recyclers (Supply chain actors) and the manufacturer using the recycled content in the finished product.
6. Applicant Declaration.

4.2 Audit Process

As part of our verification procedures, GGTI conducts audits to evaluate the authenticity, traceability, and accuracy of recycled content claims. These audits are performed with both the client (product manufacturer) and their upstream recycled content suppliers, where applicable. The audit process is aligned with ISO 14021 (International Organization for Standardization, 2016) and the Australian Government's National Traceability Framework (Department of Climate Change, December 2023).

The structured sets of questions are designed to elicit detailed responses and supporting evidence to confirm compliance with the standard's requirements for recycled content verification. These questions form the basis for traceability assessments and help ensure environmental claims are accurate, transparent, and verifiable. Evidence is source from records demonstrated on Applicant or manufacturer document or SaaS/Cloud stored records verified in real time.

These questions and document requests evaluate how manufacturers manage recycled content internally, track material origin, verify supplier claims, and ensure product declarations are based on credible data. They also assess integration with broader sustainability goals and compliance with national targets and standards.

4.3 Tracing Recycled Content Provenance

Applicants shall trace the provenance of recycled content back to the first material recovery location as a minimum requirement. This obligation applies to both post-consumer and post-industrial (pre-consumer) recycled content, and recycled content produced in Australia as well as to material imported from other countries.

Within the context of this framework, "provenance" denotes the geographical origin of the recycled content feedstock. Traceability is established from the moment the material is initially recovered. Provenance should be documented at the level of administrative division. In Australia, this corresponds to the state or territory, while in other countries it may align with a province, district, municipality, or equivalent, depending on the respective national governance structure.

To improve the accuracy and reliability of provenance data, organizations will be required as part of project assessor's evidence requests to submit evidence such as independent audits, contractual agreements, weighbridge tickets, invoices, and/or bills of lading that would enable tracing of recycled content further back to its specific source.

4.3.1 Tracing Recycled Content Composition

To support transparency and integrity in recycled content claims, this Standard requires that the composition of recycled content in products be traceable throughout the supply chain. This includes identifying the types, sources, and approximate proportions of recycled materials incorporated into the final product. Traceability must begin at the point of material recovery and continue through processing, manufacturing, and integration. Documentation should be sufficient to demonstrate compliance with relevant regulatory and environmental requirements, and may include chain-of-custody records, supplier declarations, or third-party verification. This approach enables consistent reporting, supports consumer confidence, and aligns with Australia's broader circular economy objectives.

4.3.2 Certifiable Chain of Custody Approaches

To ensure the integrity of recycled content claims, manufacturers shall adopt a documented chain of custody (CoC) approach for tracking and verifying recycled materials. The following approaches are internationally recognized and may be applied, depending on operational context and product type:

- Mass Balance

In a mass balance approach, recycled materials and non-recycled materials are combined at any point in the supply chain over a defined balancing period of 3 months for a new factory and 12 months for an existing factory. Mass balance calculations must verify that adequate quantities of recycled material are available to produce the reported amount of recycled-content materials or products. These calculations should be conducted in accordance with ISO 22095:2020 (International Organization for Standardization, 2020).

- Identity Preservation (IP)

This approach maintains the full separation of recycled materials from other materials throughout the supply chain. The recycled content is uniquely identified and tracked from the recycler through to the final product, ensuring 100% traceability and integrity of the claim, with the highest degree of physical traceability.

- Segregation

Under segregation, recycled materials are kept physically separate from virgin or non-recycled materials during processing and manufacturing. While less strict than full identity preservation, segregation ensures that no mixing occurs, and that recycled content can be reliably traced.

- Controlled Blending

In controlled blending, recycled materials are deliberately mixed with virgin materials in defined proportions. The system requires documented blending ratios and supporting records (e.g., batch sheets, production logs) to ensure that the recycled content percentage claimed is accurate and auditable.

- Book and claim or Credit trading

The Book and Claim or Credit trading approach are not certifiable under the Global GreenTag International Recycled Content Standard, as there is no physical or mass-balance link between input and output products, book and claim approach is not recommended or recognised.

4.4 Final Assessment

Recycled Content Evidence Requirements

To support recycled content claims, manufacturers are required to obtain verifiable data from their recyclers, covering a representative 12-month average of recycled material supplied, OR minimum of 3 months in the case of a newly established factory. As the certification body, we assess this evidence through tangible documentation such as supplier invoices, delivery records, product volume statements, and associated declarations.

This 12 months of data represents a suitable timeline to ensure consistency, accuracy, and traceability of the recycled content across the audit period. The data should also be within the past year. It cannot be more than a year old from the final recorded date, and it must be continuous.

All findings from prior stages are reviewed to determine certification eligibility. The final decision considers:

- a) Whether the product meets the recycled content,
- b) If supply chain traceability is robust,
- c) Whether all toxicity and legal compliance standards are met
- d) Approves the product for certification if all criteria are satisfied.

At any stage where an application does not meet the required criteria, the applicant will be informed and provided with an opportunity to supply additional information or modify their processes. Failure to provide the requested information may result in application withdrawal.

5 Circularity

Products seeking certification under this standard shall be assessed for circularity. The methodology used mirrors, and is intended to remain aligned with, the Close the Loop module of the WBCSD Circular Transition Indicators (CTI)¹. The Circular Transition Indicators (CTI) is a company-level circularity measurement framework developed and periodically updated by the World Business Council for Sustainable Development (WBCSD). Within CTI, the Close the Loop module assesses the circularity of material, water and energy flows entering and leaving a defined product system boundary.

5.1 CTI Methodology

At the material level, Close the Loop expresses circularity as the balance of two mass flows:

Inflow: the share of material entering the system boundary that is non-virgin (recycled, reused or refurbished) or renewable (bio-based from a verifiably sustainable source), as distinct from virgin fossil or virgin mineral input.

Outflow: the share of material leaving the system boundary that is recovered at end of life, expressed as the product of the technical potential for recovery and the actual recovery rate observed in the end-use market.

The headline indicator, % Material Circularity, is the arithmetic mean of these two shares, reported per material and aggregated across a product on a mass-weighted basis. Close the Loop measures material recirculation rather than material quality.

5.1.1. **Circular inflow.** For each material i:

$$\% \text{ Circular Inflow}_i = (\text{Non-Virgin Mass}_i + \text{Renewable Mass}_i) \div \text{Total Inflow Mass}_i$$

¹ *The product will be assessed against the latest published CTI edition current at the date of assessment, with a twelve (12) month grandfathering period from publication of a new edition. Where WBCSD publishes an updated edition, Global GreenTag shall review the methodology for continued equivalence and revise this standard before adoption if the calculation of % Material Circularity materially changes. Where terminology in a future edition of CTI diverges from this standard, the definitions in this standard prevail and mapping to the current edition shall be demonstrated. The methodology applied shall be stated in the reporting*

5.1.2. **Circular outflow.** For each material i:

$$\% \text{ Circular Outflow}_i = \text{Recovery Potential}_i \times \text{Actual Recovery}_i$$

5.1.3. **Material circularity.** The headline indicator for each material and, on a mass-weighted basis, for the assessed product shall be calculated as:

Per material:

$$\% \text{ Material Circularity}_i = (\% \text{ Circular Inflow}_i + \% \text{ Circular Outflow}_i) \div 2$$

Aggregated (mass-weighted, CTI portfolio method):

$$= (\Sigma \text{ Circular Inflow Mass} + \Sigma \text{ Circular Outflow Mass}) \div (\Sigma \text{ Total Inflow Mass} + \Sigma \text{ Total Outflow Mass})$$

The recycled-content component of the calculation (Non-Virgin Mass) shall be substantiated by production-route-specific evidence. Where a material may be produced by multiple routes with materially different circularity profiles, the applicant shall not rely on sector averages.

The % Material Circularity shall be reported to one decimal place.

5.2 Evidence of Conformance

The applicant shall provide the following evidence for each material assessed.

| Parameter | Acceptable evidence | Notes |
|--------------------|--|---|
| Total inflow mass | Verified purchase records; bill of materials; | Basis for the denominator of % Circular Inflow. |
| Non-virgin content | ISO 14021 self-declared claim independently verified; equivalent chain-of-custody; mill test certificate | Pre- and post-consumer recycled content shall be reported separately. |
| Renewable content | FSC / PEFC / RSPO / RTRS chain-of-custody certificate covering the declared batch | Bio-based without recognised chain-of-custody shall not be counted. |
| Recovery potential | Product design documentation; disassembly guidance; material identification per ISO 11469 | Recorded as 1.0, 0.0, or fractional (with basis). |
| Actual recovery | Regional end-of-life recovery data; take-back scheme records | Recovery rate shall reflect the geographic market of end use. |

6 Award Tier System

6.1 Certification Structure

Certification is awarded at four tiers - Bronze, Silver, Gold and Platinum. This is determined by a product's Weighted Recycled Content Score (WRCS). The WRCS applies a scientifically justified 2:1 weighting in favour of post-consumer (PC) content over post-industrial/pre-consumer (PI) content, reflecting the greater avoided-burden value of material recovered from end-of-life waste streams:

$$\text{WRCS (\%)} = \text{PC} + (0.5 \times \text{PI})$$

The four certification tiers are structured as follows

| Tier | Min WRCS | Min PC |
|---------------------|----------|------------|
| Platinum | ≥ 90% | ≥ 80% |
| Gold | ≥ 50% | ≥ 25% |
| Silver | ≥ 20% | ≥ 10% |
| Bronze ² | > 0% | No minimum |

Recycled content and Circularity certification under this Standard is not granted based on recycled content alone. All applicant products must satisfy the following mandatory requirements in full before a recycled content tier can be awarded. These requirements are non-negotiable threshold criteria: failure to meet any one of them results in ineligibility for certification regardless of WRCS achieved

- Toxicity assessment
- Social and Legal compliance
- Environmental Management System
- Occupational Health and Safety
- Durability and Fitness for Purpose

The absence of a PC floor at Bronze is a deliberate policy decision grounded in two considerations:

- **Market accessibility:** many product categories at the start of a recycled content journey have access only to post-industrial material streams. A Bronze tier without a PC floor allows these products to enter the certification system and begin demonstrating improvement.
- **Upward incentive structure:** the PC floors at Silver (≥10%), Gold (≥25%) and Platinum (≥80%) create a clear incentive for certified products to increase their post-consumer content over time to progress through the tiers.

7 Recycled Content Claim

The recycled content and circularity claim attached to the traceable item. This includes claims regarding pre-consumer or post-consumer materials, which are defined herein, (following ISO 14021). For examples of appropriate claims associated with different chain of custody methods, unsubstantiated or misleading claims must not be made. Applicants making these claims should be aware of their obligations under Australian Consumer Law. These obligations are explained in *Environmental and sustainability claims – Guidance for business*, published by the Australian Competition and Consumer Commission.

The claim should generally include the following elements, if applicable:

- for multi-component items, identify whether the claim relates to all or a component of the item (e.g. 'this product', 'the packaging', 'this product excluding component A')
- the relationship between the item and the recycled content or material (e.g. 'contains', 'made from', 'comprised of', 'supports') the percentage of recycled content (e.g. '50%', 'at least 50%', 'on average 50%')
- the recycled content status (e.g. 'pre-consumer' or 'post-consumer')
- Any additional information necessary to provide clarity and avoid deception (e.g. 'based on mass balance allocation')

² Bronze is the sole tier with no minimum post-consumer content requirement, providing an accessible entry point for products at the beginning of a recycled content journey. Silver, Gold and Platinum require progressively higher post-consumer content proportions and progressively more rigorous third-party verification

Note: All recycled content claims shall comply with ISO 14021:2018 , Australian Consumer Law (ACL) & the obligations which are also explained in the ACCC’s Making environmental claims (Commission, December 2023), or equivalent environmental claim requirements for the relevant country/market ensuring that claims are truthful, specific, and substantiated with documented evidence.

APPENDICES

Appendix A: Recycled Content Application Checklist

This checklist provides guidance on the evidence and declaration requirements for the Global GreenTag Recycled Content and Circularity audit. While this checklist is intended to give a general overview of evidence and declarations needed to progress towards certification, it is not a definitive document on all evidence and declaration requirements which may be required, depending on The Product/s.

- 1- Recycled Content Declaration: A formal declaration of the percentage of recycled content in the product (Sign and Return Declaration of Accuracy).
- 2- Complete and return the SKU Register to identify products within scope of certification.
- 3- Complete Recycled Content and Circularity Applicant Declaration
 - a. Legal compliance and Ethical employment evidence
 - b. Durability/Fitness for purpose test reports
 - c. Purchase invoices for PC recycled content material indicating the total annual purchase volume and the total annual production volumes of finished Products. This will be used to check the % recycled content claim.
- 4- Complete Recycler declarations
 - a. Recycled Content Declarations must be signed by all Teir 1 suppliers of recycled content
 - b. Material Reprocessing Declaration must be completed and signed by all recovered materials reprocessing companies.
- 5- Complete and return the GreenTag Ingredient Questionnaire with:
 - a) Chain of Custody (CoC) Evidence.
 - b) Evidence of Source Material.
 - c) Material Safety & Toxicity Information: Safety Data Sheets (SDS)/Material Safety Data Sheets (MSDS) for each ingredient on the questionnaire.
 - i. A toxicity evaluation is conducted in accordance with ESCAP standards to ensure the product does not contain hazardous or restricted substances.
 - ii. Products passing the toxicity review will advance to the Conformance and Risk Assessment.
 - iii. Products failing the assessment will have their applications rejected.
 - d) EMS and OHS documentation as per mandatory requirements.
 - e) Recycled content Supply chain Map.

Final Evidence:

- 6- Audit:
 - a) Complete an Audit of manufacturer's Recycled content Process.
 - b) Review and return signed audit package.

Appendix B: Recycled Content- Audit Questions

The below questions are the Core and Additional questions which are considered during the virtual audit of the recycler's system and process to verify its compliance to our Recycled content traceability standard and imply that the relevant records (including SaaS and cloud stored digital records) are provided in all relevant instances.

| Question Type | Manufacturer Questions | Recycled Content Supplier Questions |
|---|--|---|
| Core | What is the origin of the recycled materials used in your products? | What recycled material do you supply, and what is its origin (pre- or post-consumer)? |
| | How do you verify the authenticity and quality of the recycled materials you receive? | What quality control processes are in place during collection, sorting, and processing? |
| | What chain of custody approach do you use to ensure the recycled content in your products is accurately tracked? | What tracking system do you use to document the quantity and type of recycled input per batch or delivery? |
| | How do you ensure that the recycled content claims on your products are accurate and verifiable? | Do you provide a Recycled Content Declaration (RCD) or other formal documentation for your clients? |
| | What testing or verification processes do you use to confirm the quality of recycled materials? | Are you certified under any recognised recycled content or chain of custody programs? |
| | How do you trace the recycled content in your products back to its original source?. | How do you separate recycled material from virgin input within your processes? |
| | What specific data do you require from recyclers to support your recycled content claims? | What specific documentation do you provide to support downstream recycled content claims? |
| | How do you manage and document the use of blended materials in your manufacturing process? | How do you manage input streams when materials are blended at source or during processing? |
| | Do you require your suppliers to be certified under specific recycled content certification schemes? | Are your facilities or supply chains subject to third-party traceability or content audits? |
| | How do you ensure that the recycled materials maintain their quality during the manufacturing process? | What process controls are used to maintain material quality post-recycling? |
| | What steps do you take to ensure that your products meet all relevant environmental and safety standards? | What material compliance testing do you perform before dispatch? |
| | How do you calculate and report the percentage of recycled content in your products? | How do you quantify recycled content by weight or volume in your outgoing products? |
| | How do you integrate traceability data from recyclers into your own systems? | How do you make traceability data available to downstream customers or auditors? |
| | Do you conduct audits or verifications of your suppliers' traceability practices? | Have your operations undergone third-party traceability or chain of custody audits? |
| | What procedures do you have in place for addressing discrepancies in recycled content data? | What corrective actions do you take when traceability or content inconsistencies are found? |
| | How do you ensure your staff are trained in the importance and management of recycled content? | What training do your staff receive in recycled content handling and documentation? |
| | How do you protect the confidentiality of sensitive traceability information? | How do you handle client proprietary or sensitive traceability data? |
| | How do you stay informed about and adapt to changes in regulations or standards related to recycled content? | How do you update clients when standards or classifications of recycled material change? |
| | What are your sustainability goals related to increasing the use of recycled content in your products? | How does your supply chain strategy support circularity or increased recycling targets? |
| | Additional | Do you require your suppliers to participate in third-party verification programs for recycled content, and how do you verify their compliance? |
| How do you verify the claims recycled content made by your suppliers, and what specific documentation do you require from them? | | What type of claims do you make to manufacturers, and how are they substantiated? |

| | |
|--|---|
| Have you undergone any onsite audits or third-party verifications to confirm the recycled content in your products? | Have you facilitated or participated in client-driven recycled content audits? |
| How do you communicate the recycled content in your products to consumers? | Do you offer branding or labelling support for clients making environmental claims? |
| What role does recycled content traceability play in your sustainability strategy? | How is traceability embedded into your business and sustainability model? |
| How do you handle discrepancies or issues in the traceability data provided by your suppliers? | What systems do you have in place to reconcile data inconsistencies with your suppliers? |
| How do you ensure that your traceability systems are compatible with those of your suppliers and partners? | What data-sharing or interoperability mechanisms are used in your supply chain? |
| What training or resources do you provide to your staff to ensure they understand the importance of recycled content traceability? | How often are your employees trained on evolving traceability requirements? |
| How do you stay informed about updates to the National Framework for Recycled Content Traceability? | What actions do you take to remain compliant with new regulatory traceability frameworks? |

Appendix C: ESCAP and GCAPs Assessment

Applicants must provide a list of their Products and its ingredients, identifying CAS numbers and a list all suppliers. Applicants are required to provide a full declaration of substances down to 0.01% by weight of homogenous materials used in the product (or further such more detailed requirements as may be required by sector specific or Supplementary Standard).

The following is the process for ESCAP and GCAPs assessment:

1. Classify Inputs

A toxicity assessment can only be conducted when a full understanding of product inputs, their function and risks are identified. First step to ESCAP assessment is to classify Product inputs into homogenous materials, substance, intentionally used substance, intended reaction product, impurities, parts, defined materials and undefinable materials.

2. Determine scope

Product Assessors are required to determine the scope of toxicity assessment to clearly communicate the boundaries of where risk was identified and assessed. In general, the risk assessment for the Product is undertaken at substance level; however, when Tier 1 suppliers are handling monomers, catalysts, processing aids, auxiliaries, etc then the risk assessment will be taken further to the Intended Reaction Product and Intentionally Used Substance level and use context.

3. Identify CAS numbers and their relevant R-phrases or H statements

Determine the Chemical Abstract Service (CAS) number and where relevant names as per The International Union of Pure and Applied Chemistry (IUPAC), then using the chemical databases prescribed by the Standard/s below determine the various H statements or their equivalents in R-phrases attributed to a material.

International: CLP Regulation (EC) 1272/2008 - EU Regulation on the Classification, Labelling and Packaging of Substances and Mixtures, United Nations Globally Harmonized System of Classification and Labelling of Chemicals (GHS) UN GHS.

Australia: Safe Work Australia's Hazardous Chemical Information System (HCIS).

Using the H statements (or their equivalents in R-phrase), Level 1, 2 and 3 chemical categorisations, a material is classified according to their potentially adverse health and environmental effects.

For 'Undefinable Materials (UVCBs)' see clause 8.0 (f).

4. Preliminary Assessment

Specific thresholds have been set for each level of chemical, to determine what action should be taken with a particular product based on NOAELs and NOAECs from GHS, in Table 1 below and where relevant to a Supplementary Product Category, in Appendix 1 of the Current Global GreenTag International Standard or other respective GGTI Standards.

Example, a product that contains a Level 1 Chemical warrants an Issue of Concern if the chemical is greater than 0.1% of the Products total mass and warrants Red Light Exclusion if the chemical constitutes greater than 1% of the Products total. Note see Tables 1-3 below for H statement Actions.

Step 1: Based on the level categorisation of the H statement, determine whether the Product is assessed as being excluded, if a Cautionary Comment is to be applied and if so at what level.

More detailed information regarding the ESCAP assessment can be found in the current GGT International Standard and GCAPs in current GGT Cleaning Products Standard and the GGT Personal Product Standard.

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